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April 30, 2019

VIA ECF FILING

United States District Court
Northern District of New York
James T. Foley U.S. Courthouse
445 Broadway
Albany, NY 12207-2974


Att: Chief Judge Gary L. Sharpe
Re: Jane Doe v. Union College, et al.
Civil Case No.: 1:19-cv-284 GLS/CFH
Our file: 29780

Dear Judge Sharpe:

As you know, our office represents the defendants, Union College, The Board of Trustees of Union College, Melissa A. Kelley, Trish Williams and Darcy Czajka, relative to the above-referenced matter. We are in receipt of plaintiff's First Amended Complaint (Dkt. 19). We intend to file a motion to dismiss the complaint pursuant to Federal Rules of Civil Procedure 12(b)(6). Pursuant to this Court's Local Rules, we are seeking permission to file a Memorandum of Law in excess of the 25-page limit set forth in Rule 7.1(a)(1). We do not anticipate that the Memorandum of Law will exceed thirty-five (35) pages. This enlargement is necessary to permit the defendants to address plaintiff's complaint, consisting of 283 paragraphs over 48 pages, and to cover numerous points in the Memorandum of Law.

Thank you for your consideration of this request.

Respectfully submitted,



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MJM:mmk

CARTER, CONBOY, CASE, BLACKMORE, MALONEY & LAIRD, P.C.

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cc: **Via ECF Filing**
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